

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Jason M Crouch
Carlene D Chin-Crouch

Debtors

Chapter 13

Bankruptcy No.24-12738-AMC

OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTORS

AND NOW comes Scott F. Waterman, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtors, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtors have failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtors to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The claims and/or claim amounts identified in the Plan are inconsistent with one or more filed proofs of claim.

The Plan is unclear and/or incorrect as to how the secured and priority claims are to be treated and/or paid by the standing trustee.

Debtor(s) has/have failed to file an accurate statement of current monthly income, and/or if the debtor(s) has/have above-median income, an accurate calculation of disposable income in accordance with Section 1325(b)(3), on Official Form 122C, as required by Bankruptcy Rule 1007(b)(6).

The Plan does not provide for the submission of all or such portion of future earnings or other future income of the debtor(s) to the supervision and control of the standing trustee as is necessary to fund the Plan, in violation of 11 U.S.C. Sections 1322 (a)(1).

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Scott F. Waterman

Scott F. Waterman, Esquire
Chapter 13 Standing Trustee